

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

**ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS**

Pursuant to Section 15(c) of the Court's Scheduling Order as amended, Plaintiff ePlus, Inc. ("ePlus"), through counsel, hereby submits the following general and specific objections to Defendant Lawson Software, Inc. ("Lawson")'s proposed exhibit list for contempt proceedings:

General Objections

1. Documents not previously disclosed during discovery or pursuant to Court Order.
ePlus objects generally to the introduction of any evidence which, though it may be relevant to Lawson's defenses, was not previously disclosed during discovery or in its responses to ePlus's interrogatories.
2. Relevance. ePlus objects generally to Lawson's introduction of any evidence having no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable and to the introduction of evidence wherein the probative value of that evidence is substantially outweighed by the danger of unfair prejudice,

confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.

3. Attorney comment or argument. ePlus objects generally to Lawson's attempt to introduce, as substantive evidence, litigation documents including discovery responses, deposition transcripts, briefs filed with the Court and correspondence amongst the attorneys. These documents are not evidence and should not be presented as such in the contempt hearing.

KEY FOR EXHIBIT OBJECTIONS

Reference	Basis for Objection
106	Fairness requires admission of other evidence contemporaneously.
401/402	The evidence in the exhibit is not relevant and is not admissible.
403	Any relevance of the exhibit is substantially outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury, or considerations of unfair delay, waste or confusion of the issues, misleading the jury, or considerations of unfair delay, waste of time, or needless presentation of cumulative evidence.
801/802/805	The exhibit contains or is hearsay and no exception applies and/or the exhibit contains or is hearsay within hearsay and no exception applies.
901	The exhibit lacks authentication.
1003	Poor duplicate – unfair to admit as duplicate (Best Evidence)
1006	The evidence in the exhibit includes improper summary of evidence.
FRCP 26	Not timely disclosed.
MIL	Subject of motion <i>in limine</i> .
NR	Exhibit not received—all objections are reserved.
INACC	Inaccurate or incomplete description of exhibit.
NOT EVIDENCE	Exhibit is not evidence under the Federal Rules of Evidence.

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-500				1/27/2011	Signed verdict form		X						X			
DX-501				1/4/2011	Transcript of merits trial (Opening Statement) (pages 112-196)	X	X		X				X			
DX-502				1/4/2011	Transcript of merits trial (Testimony of Douglas Momyer) (pages 216-399)	X	X		X				X			
DX-503				1/5/2011	Transcript of merits trial (Testimony of Jim Johnson) (pages 448-480)	X	X		X				X			
DX-504				1/5/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 482-510)	X	X		X				X			
DX-505				1/6/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 517-922)	X	X		X				X			
DX-506					WITHDRAWN											
DX-507					WITHDRAWN											
DX-508					WITHDRAWN											
DX-509					WITHDRAWN											
DX-510					WITHDRAWN											
DX-511				1/13/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 1723-1778)	X	X		X				X			
DX-512				1/14/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 1792-1948)	X	X		X				X			
DX-513				1/20/2011	Transcript of merits trial (Testimony of Brooks Hilliard) (pages 2656-2792)	X	X		X				X			
DX-514				1/24/2011	Transcript of merits trial (Closing Arguments) (pages 3085-3230)	X	X		X				X			
DX-515					WITHDRAWN											
DX-516					WITHDRAWN											
DX-517					WITHDRAWN											
DX-518					WITHDRAWN											
DX-519					WITHDRAWN											
DX-520					WITHDRAWN											
DX-521	PX-368			1/20/2012	Golberg Report Ex. 3 - Video - Weaver Merits Trial Two								X			
DX-522	PX-380			1/20/2012	Punchout demonstration								X			
DX-523				1/20/2012	Golberg Report Ex. 4 - Video - Weaver Merits Trial Item Master / Punchout demonstration				X							
DX-524				1/20/2012	Golberg Report Ex. A - Goldberg CV											
DX-525	PX-1166	RQC0000744	RQC0000744		Source code	X	X	X					X		X	
DX-526	PX-1167	RQC0000745	RQC0000745		Source code	X	X	X					X		X	
DX-527	PX-1172	RQC0000746	RQC0000746		Source code differences file	X	X	X					X		X	
DX-528	PX-1168	RQC0000747	RQC0000747		Source code	X	X	X					X		X	
DX-529	PX-1169	RQC0000748	RQC0000748		"Lawson 4GL Diff Document"	X	X	X					X		X	
DX-530	PX-1173	RQC0000749	RQC0000749		Source code differences file	X	X	X					X		X	
DX-531	PX-1170	RQC0000750	RQC0000750		Source code differences file	X	X	X					X		X	
DX-532	PX-1171	RQC0000751	RQC0000751		Source code differences file	X	X	X					X		X	
DX-533	PX-1159	RQC0000730	RQC0000730		"Important Notice: Recommended Patch Available for Procurement Punchout Customers"											
DX-534	PX-1160	RQC0000731	RQC0000731		"Patch for Requisition Center 9.0.1 Now Available"											
DX-535				5/6/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						
DX-536				5/18/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						
DX-537				6/16/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						
DX-538				6/24/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						
DX-539				6/28/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						
DX-540				7/1/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X	X						

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-541				7/6/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus inc. v. Lawson Software, Inc.		X	X	X	X						
DX-542					WITHDRAWN											
DX-543	PX-1				U.S. Patent No. 6,023,683											
DX-544					WITHDRAWN											
DX-545				1/4/2011	Weaver Trial Demonstratives	X	X	X	X	X			X			
DX-546				3/30/2011	Lawson Opposition to Motion for Permanent Injunction		X	X	X	X						
DX-547				4/1/2011	ePlus Reply to Motion for Permanent Injunction		X	X	X	X						
DX-548				4/4/2011	Transcript of April 4, 2011 Injunction Hearing	X	X	X	X	X						
					2012.01.06 Deposition of Dean Hager – Exhibit 4 – Email from Mike Cohen to Bruce McPheeters FWD: CUE Demo Plans, need help.											
DX-549	PX-1088	ROC2282399	ROC2282402	3/7/2011	2012.01.06 Deposition of Dean Hager – Exhibit 6 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 9 – Email from K. Lohkamp to D. Hager RE: Questions											
DX-550	PX-1090	ROC0026599	ROC0026602	3/25/2011												
DX-551			ROC0054042	5/10/2011	Email from Jim Catalano to Dean Hager RE: Anything on e-Plus? I have staff meeting and wanted to provide update fix.		X	X	X	X						
					2012.01.06 Deposition of Dean Hager – Exhibit 28 – Email from Jennifer Langer to Guy Leduc et al. FW: Supporting Materials for Mig 2:00 – RE: project team for ePlus (and attachment)											
DX-552	PX-1111	ROC2091954	ROC2091959	5/26/2011												
DX-553		ROC2125837	ROC2125837	4/13/2011	Email from Dean Hager to Darci Snyder Re: Clarity on mobile reqs		X	X	X	X						
DX-554		ROC0922446	ROC0922446	4/25/2011	Email from Jennifer Langer to Michael Poling et al. URGENT: Your Action Required for Q4 Opportunities and Beyond (S3 Requisitions Self Service)		X	X	X	X						
DX-555		ROC0870441	ROC0870443	5/9/2011	2012.01.06 Deposition of Dean Hager – Exhibit 12 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 8 – Email from D. Christopherson to D. Hager, B. McPheeters et al. RE: RQC Patch 1 updated											
DX-556	PX-1096	ROC0914942	ROC0914945	6/9/2011												
DX-557	PX-1037	ROC0000636	ROC0000637	6/3/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – "Decommission Notice – S3 Requisitions Self-Service"											
DX-558	PX-1104	ROC0000732	ROC0000738	5/27/2011	"Immediate replacement of Requisitions Self Service software products required."											
DX-559		ROC0762337	ROC0762343	6/1/2011	"Immediate replacement of Requisitions Self Service software products required."											
DX-560		ROC0000724	ROC0000725	5/27/2011	"Immediate Support Stop for M3 e-Procurement solution required."		X		X							
DX-561	PX-1033	ROC0109373	ROC0109373	10/5/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 04 – Spreadsheet – Customer List											
DX-562				12/19/2011	Spreadsheet – Customer List (update of October 5, 2011 version)		X									
DX-562A				3/15/2013	Summary Chart of Lawson US Customers with Configuration 3 and 5 on Active Maintenance as of May 23, 2011.											
DX-563	PX-1035	ROC0561907	ROC0561909		2011.12.21 Deposition of Elizabeth Homewood – Exhibit 06 – "Timeline for ePlus Patent Litigation (ERH)"		X			X	X	X		X		
DX-564					WITHDRAWN											
DX-565		ROC2076749	ROC2076750	5/29/2011	Email from N. Anderson to R. Umali et al. re: PLEASE READ – Important Content		X		X							
DX-566		ROC0915427	ROC0915428	6/1/2011	Email from E. Homewood to N. Anderson RE: ePlus – Status Update		X		X							
DX-567		ROC0004126	ROC0004126	6/2/2011	Email from E. Homewood to ORG-All Support & Delivery re: IMPORTANT – PLEASE READ: Knowledge Base unavailable externally		X		X							
DX-568	PX-1156	ROC0000722	ROC0000722	5/18/2011	"Lawson S3 Requisition Center is generally available today – May 18th, 2011."											

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	\$01/802/8 05	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-569		RQC0915431	RQC0915432		External Communications		X	X	X	X						
DX-570					WITHDRAWN											
DX-571		RQC0113765	RQC0113775		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-572					WITHDRAWN											
DX-573					WITHDRAWN											
DX-574		RQC0113826	RQC0113829		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-575					WITHDRAWN											
DX-576		RQC0113869	RQC0113870		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-577		RQC0113907	RQC0113908		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-578		RQC0113998	RQC0114035		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-579					WITHDRAWN											
DX-580					WITHDRAWN											
DX-581					WITHDRAWN											
DX-582		RQC0114771	RQC0114772		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-583		RQC0115382	RQC0115382		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-584		RQC0116773	RQC0116774		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-585	PX-1060	RQC0109375	RQC0109375		2011.12.29 Deposition of Scott Hanson - Exhibit 10 - "RQC SWAT Cases" spreadsheet											
DX-586	PX-1195	RQC0111357	RQC0111366	8/22/2011	Lawson Consulting Services - RQC SWAT Team Financial Update											
DX-587		RQC0355362	RQC0355362	5/27/2011	Email from S. Hanson to TEAM-Scott Hanson, TEAM-Mark Deutsch, and TEAM-Joey Alcazar re: Installation/Patching of RSS		X	X	X							
DX-588		RQC00017353	RQC00017354	5/27/2011	Email from B. Offenbacher to S. Hanson and M. Roisum RE: Greenville RSS Install											
DX-589		RQC2296568	RQC2296570	5/28/2011	Email from C. Bennett to S. Merten re: Team call notes and CRITICAL UPDATE - PLEASE REVIEW ASAP		X	X	X							
DX-590	PX-1152	RQC0000348	RQC0000363	5/1/2011	Lawson Requisition Center Installation Guide, Version 9.0.1 (IBM)				X							
DX-591					2011.12.29 Deposition of Scott Hanson - Exhibit 08 - Lawson Requisition Center Installation Guide, Version 9.0.1 (Unix/Windows)											
DX-592	PX-1059	RQC0000364	RQC0000379	6/1/2011	WITHDRAWN											
DX-593	PX-1061	RQC0109374	RQC0109374		2011.12.29 Deposition of Scott Hanson - Exhibit 11 - "RQC SWAT Activities" spreadsheet											
DX-594	PX-1012	RQC0000384	RQC0000384	5/1/2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 20 - Lawson Requisition Center User Guide, Version 9.0.1											
DX-595					WITHDRAWN											
DX-596					WITHDRAWN											
DX-597		RQC2656377	RQC2656380	6/22/2011	Email from T. Olson-Stapp to D. Hager FW: RQC SWAT status - June 20 2011		X	X	X							
DX-598					WITHDRAWN											
DX-599					WITHDRAWN											
DX-600					WITHDRAWN											
DX-601					WITHDRAWN											
DX-602					WITHDRAWN											
DX-603					WITHDRAWN											
DX-604					WITHDRAWN											
DX-605	PX-1019	RQC2291408	RQC2291410	4/25/2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 7 - Email from K. Lohkamp to D. Snyder, D. Kemper, J. Langer RE: Please Read: Additional suggested change to the Requisition Center											Stipulated Exhibit
DX-606	PX-1113	RQC0983191	RQC0983229	6/3/2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 10 - Presentation: Introducing Lawson Requisition Center											Stipulated Exhibit
DX-607	PX-1105	RQC0869062	RQC0869093	6/3/2011	Deposition of Keith Lohkamp - Exhibit 11 - Email from J. Langer to N. Anderson FW: LRC webinar follow-up: questions and recordings w/ attachment LRC Question and Answers.txt											Stipulated Exhibit
DX-608		RQC0117217	RQC0117227	4/6/2011	Requisition Center Launch Project Charter											No Objections

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-609	PX-1115	ROC0590893	ROC0590903	5/2/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 13 – Email and attachment, Lawson Requisition Center, How To Sell											
DX-610	PX-1116	ROC2300171	ROC2300173	5/18/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 14 – Email from D. Christopher to D. Kempker, J. Langer et al. RE: Recommendation on next steps for RSS and ROC											
DX-611					WITHDRAWN											
DX-612					WITHDRAWN											
DX-613					WITHDRAWN											
DX-614					WITHDRAWN											
DX-615					WITHDRAWN											
DX-616					WITHDRAWN											
DX-617					WITHDRAWN											
DX-618					WITHDRAWN											
DX-619		ROC2076803	ROC2076803	Undated	"RSS Injunction Plan" Excel spreadsheet		X	X	X	X						
DX-620					WITHDRAWN											
DX-621		ROC2253556	ROC2253557	6/6/2011	Email from K. Lohkamp to G. Benton RE: Call notes – Version Dependencies for ROC		X	X	X	X						
DX-622		ROC2120905 1	ROC2120905 33	6/7/2011	"Lawson Requisition Center Field Enablement" presentation											
DX-623	PX-1068	ROC0870774	ROC0870777	6/2/2011	Email from K. Lohkamp to D. Davidson Re: RSS to Req Center Upgrade											
DX-624	PX-1010	ROC0000666	ROC0000690	6/3/2011	Introducing Lawson Requisition Center											
DX-625	PX-1011	ROC0000695	ROC0000708	5/1/2011	Lawson Requisition Center Overview											
DX-626	PX-1000	ROC0000001	ROC00000046		Lawson Procurement Punchout and PO Dispatcher Installation and Administration Guide for Lawson Applications 8.1.x and 9.x Version 9.0.1.4											
DX-627					WITHDRAWN											
DX-628		ROC2270563	ROC2270564	6/10/2011	Email from D. Christopher re Q&A and Patch 1											
DX-629		ROC0860711			Spreadsheet detailing hours spent on ROC				X	X						
DX-630		ROC0849279			Spreadsheet detailing hours spent on ROC				X	X						
DX-631		ROC0118131			Lawson Requisition Center User Guide											
DX-632		EPLUSPT000315	EPLUSPT000316	6/1/2011	Email from Kley Pakhurst to Ken Farber et al. FW: Lawson Injunction.....		X	X	X	X						
DX-633		EPLUSPT000319	EPLUSPT000320	6/3/2011	Email from Ken Farber to raosu@trinity-health.org. FW: Lawson Injunction		X	X	X	X						
DX-634					WITHDRAWN											
DX-635					WITHDRAWN											
DX-636					WITHDRAWN											
DX-637					WITHDRAWN											
DX-638					WITHDRAWN											
DX-639					WITHDRAWN											
DX-640					WITHDRAWN											
DX-641					WITHDRAWN											
DX-642					WITHDRAWN											
DX-643	PX-1077				2012.01.05 Deposition of Kevin Samuelson – Exhibit 7: Lawson US FY11 (May 31, 2011) Actual P&L Profit by Revenue Type											
DX-644	PX-1078				2012.01.05 Deposition of Kevin Samuelson – Exhibit 8: Product SKUs											
DX-645					WITHDRAWN											
DX-646					WITHDRAWN											
DX-647					WITHDRAWN											
DX-648					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 4: Effects of isolated corrections to Dr. Ugone's calculations		X		X	X	X					X
DX-649					WITHDRAWN											
DX-650					WITHDRAWN											
DX-651					WITHDRAWN											
DX-652					WITHDRAWN											

Specific Objections

Def. No.	Pl. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-653					WITHDRAWN											
DX-654					WITHDRAWN											
DX-655					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: ePlus income statement (FY Q3:2011 – Q2:2012)		X		X	X	X					X
DX-656					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Lawson income statement: Americas region (FY 2011)		X		X	X	X					X
					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule A: Lawson income statement: Americas region (FY 2011); profit margins for license, maintenance, and service revenues		X		X	X	X					X
DX-657					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule B: Regression results to determine Lawson's incremental margin		X		X	X	X					X
DX-658					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule C: Lawson incremental profit		X		X	X	X					X
DX-659					WITHDRAWN											
DX-660					WITHDRAWN											
DX-661					WITHDRAWN											
DX-662					WITHDRAWN											
DX-663					WITHDRAWN											
DX-664					WITHDRAWN											
DX-665					WITHDRAWN											
DX-666					WITHDRAWN											
DX-667					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Summary of RSSRQC customers		X		X	X	X					X
DX-668					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Schedule A: List of customers in prohibited configurations		X		X	X	X					X
DX-669					WITHDRAWN											
DX-670					WITHDRAWN											
DX-671					WITHDRAWN											
DX-672					WITHDRAWN											
DX-673					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 5: Lawson quarterly sales and marketing expenses vs. revenues vs. (2000-2011)		X		X	X	X					X
DX-674					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 6: Quarterly % changes in Lawson revenues vs. sales & marketing expenses 2000-2011		X		X	X	X					X
DX-675					WITHDRAWN											
DX-676					WITHDRAWN											
DX-677					WITHDRAWN											
DX-678		L0305236	L0305319	8/21/2007	Lawson Software Customer Agreement with Heartland Regional Medical Center	X	X		X							
DX-679		ePLUS0949075	ePLUS0949075	4/26/2010	Income Statement – ePlus Systems ePlus 10-K Forms (2009-2011)		X	X	X				X			
DX-680					The Forrester Wave: eProcurement Solutions, Q1 2011											
DX-681	PX-690				ePlus, Inc. Statement of Profit and Loss Fiscal Years ending March 31		X	X					X			
DX-682					Lawson Annual 10-K Forms (2009)											
DX-683	PX-103			7/1/1905	Lawson Annual 10-K Forms (2010)											
DX-684	PX-440			7/2/1905	WITHDRAWN											
DX-685					Lawson Financial Data 2000-2011 downloaded from Thomson Financial		X		X			X		X		
DX-686					WITHDRAWN											
DX-687					Draft email from Keith Lohkamp to Will Schultz RE: URGENT ePlus – Declarations from customers		X		X							
DX-688		RQC1002864	RQC1002866	9/1/2011	Email from Dale Christopherson to Will Schultz RE: # of total hours to transition to ROC		X									
DX-689		RQC1003054	RQC1003055	6/27/2011												

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-690		ROC1000122	ROC1000123	6/3/2011	Email from Dale Christopherson to Todd Dooner Fwd: Updated on Requested Change to Requisition Center related to punchout						No Objections					
DX-691		ROC1000157		6/1/2011	Email from Dale Christopherson to John Mulchrone FW: Change to Punchout		X		X	X	No Objections					
DX-692		ROC0859381		6/3/2011	Meeting request from Bruce McPheeters Re: Urgent call at 4 pm Central today to decide about additional punchout change						No Objections					
DX-693	PX-1002	ROC00000638	ROC00000655	6/3/2011	"Introducing Lawson Requisition Center Webinar (June 3, 2011) Questions And Answers"						No Objections					
DX-694		ROC2270553	ROC2270574	6/10/2011	Email from Dale Christopherson FW: For Legal Review - Q&A from Friday Webinar + Attachment						No Objections					
DX-695	PX-1155	ROC00000709	ROC00000721	6/9/2011	"Lawson Requisition Center What's New and Different"						No Objections					
DX-696	PX-1049	ROC2154688	ROC2154689	4/21/2011	Email from Dale Christopherson to Keith Lohkamp and Todd Dooner Re: Here is the concept						No Objections					
DX-697		ROC2139806	ROC2139821	6/10/2011	Letter from Dan McDonald to Scott Robertson Re: ePlus Inc. v. Lawson Software, Inc.		X		X	X	No Objections					X
DX-698		ROC1000847	ROC1000848	2/1/2011	Calendar invite from Bruce McPheeters Re: Important ePlus patent suit Planning meeting - Please Attend						No Objections					
DX-699		ROC1001536		2/17/2011	Email from Dan McDonald RE: Urgent: Your help needed with battle plan against ePlus	X			X	X						
DX-700		ROC0919780 00001		3/11/2011	Email from John Mulchrone Re: ePlus- Quick Update				X							
DX-701		ROC1000376		3/31/2011	Email from Dale Christopherson to Guenther Tokmit RE: do you want to be updated on the RSS replacement project						No Objections					
DX-702		ROC0915215_00001	ROC0915215_00002	4/12/2011	Email from Dale Christopherson to John Mulchrone FW: ePlus - proposed behavior for RSS and Punchout		X		X	X						
DX-703					WITHDRAWN											
DX-704		ROC0868692_00001	ROC0868692_00002	2/9/2011	Meeting invite Re: Canceled: Urgent: Your help needed with battle plan against ePlus	X	X		X	X						
DX-705		ROC0868732_00001	ROC0868732_00004	2/9/2011	Attachment to DC-710 'S-3 RSS/Punchout and M3 Battle Plan Against ePlus				X	X						
DX-706		ROC0915301	ROC0915301_00010	3/14/2011	Email from Dale Christopherson attaching "2011 03 11 Mitigation Strategiesv2 (2).pptx"				X	X						
DX-707	PX-1041	ROC0117312	ROC0117313	6/7/2011	Calendar invite from Jennifer Langer Re: RQC Team: Legal requested changes to Punchout ...						No Objections					
DX-708		ROC3005746	ROC3005747	6/7/2011	Email from Bruce McPheeters to Keith Lohkamp RE: Need Guidance on Patch						Duplicate of DX-737					
DX-709		ROC0860636	ROC0860639	6/28/2011	Jira ticket Case 132676 Summary						No Objections					
DX-710	PX-1178	ROC0010354	ROC0010357	4/26/2011	Email from Dale Christopherson FW: How did testing go?						No Objections					
DX-711	PX-1244	ROC2741740		10/31/2012	USA PL FY12 10-31-12 - 2012 F&L Statement						No Objections					
DX-712	PX-1245	ROC2741741		12/1/11 - 8/31/12	Lawson Revenue SKU Report ALL Data - 8-31-12						No Objections					
DX-713	PX-1249	ROC2741745		11/30/2012	Lawson Revenue SKU Report All Data - 11-30-12						No Objections					
DX-714					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 1: Curriculum Vitae of Jonathan D. Putnam, PhD.		X									X
DX-715					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 2: List of Documents Considered		X									X
DX-716					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 2: List of Documents Considered		X									X
DX-717					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 3: Comparison of Damages Calculation.		X									X
DX-718					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 4: Apportionment of Lawson accused revenues		X									X
DX-719					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. - Exhibit 5: Summary of Lawson Accused Revenues		X									X

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 2.6	MIL	NR	INACC	NOT EVIDENCE
DX-720					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6: Summary of Lawson Accused License and Maintenance Revenues		X									X
DX-721					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: Calculation of Accused Service Revenues		X									X
DX-722					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7H: Calculation of Accused License/Maintenance for Healthcare Customers		X									X
DX-723					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6H: Calculation of Accused Service Revenues for Healthcare Customers		X									X
DX-724					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Calculation of Apportionment Factors		X									X
DX-725					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Lawson Income Statement		X									X
DX-726					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 10: Lawson Income Statement: Americas Region, Profit Margins		X									X
DX-727					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 11: Regression Results to Determine Lawson's Incremental Margin		X									X
DX-728					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Calculation of Lawson's Incremental Profit		X									X
DX-729					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 13: Summary of Lawson Customers with Prohibited Configurations		X									X
DX-730					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 14: Customers Without All Infringing SKUs		X									
DX-731				5/26/1993	Lawson Software Customer Agreement with Cash America International, Inc.		X		X							
DX-732				5/30/2002	Lawson Software Customer Agreement with Legacy Health System		X		X							
DX-733	PX-0280	LE00206653		3/22/2005	Presbyterian Healthcare Services ERP System Request for Proposal		X		X							
DX-734	PX-0367	ePLUS0942359		4/22/2010	ePlus screenshots of RSS punchout demo		X		X							
DX-735	PX-0379	ePLUS0948949		5/3/2010	ePlus screenshots of RSS item Master/punchout demo		X		X							
DX-736	PX-1250	RQC3000243		6/3/2011	Email string from D. Christopher to J. Mulchrone and B. Crawford F.W. Changes RSS to RQC		X		X							
DX-737	PX-1235	RQC1003184		6/7/2011	Email string from J. Langer to B. McPheeters, K. Lohkamp and M. Cohen re: Need Guidance on Patch		X		X							
DX-738		RQC1003001		5/23/2011	(Und. Direct Ex. 1) Email from D. Hager to J. Catalano, B. Murphy and D. Siebert re RSS deals this quarter		X		X							X
DX-739		ePLUS0229572		5/26/2004	ePlus v. Arba Complaint dated May 26, 2004		X		X							X
DX-740		ePLUS0232981		4/18/2005	ePlus v. SAP Complaint dated April 18, 2005		X		X							
DX-741		ePLUS0430972		6/17/2002	Master Software License Agreement between ePlus and Gannett		X		X							
DX-742				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Second Set of Interrogatories dated 05/18/10		X									
DX-743				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Fourth Set of Interrogatories dated 05/18/10		X									
DX-744				2/7/2011	ePlus's Rule 26 Supplemental Disclosure Concerning Injunctive Relief		X									
DX-745				2/10/2011	Office Action mailed February 10, 2011 in U.S. Application No. 90/011,066 (1683 Patent, claims 1-25)		X		X				X			
DX-746					ePlus Rebuttal Disclosure Concerning Injunctive Relief		X									X
DX-747					WITHDRAWN		X									

Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401/402	403	801/802/805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-748	PX-0043	ePLUS0524597	ePLUS0524622	2/12/2005	Settlement & License Agreement between Ariba, Inc. and ePLUS, Inc., dated February 12, 2005		X	X					X			
DX-749	PX-0317	ePLUS0940765	ePLUS0940776	8/28/2009	Settlement and License Agreement between ePLUS Inc. and Perfect Commerce, LLC and Exhibits A and B		X	X					X			
DX-750	PX-0318	ePLUS0940777	ePLUS0940801	12/11/2006	Patent License and Settlement Agreement among SAP America, Inc., SAP AG and ePLUS Inc.		X	X					X			
DX-751	PX-0319	ePLUS0940802	ePLUS0940814	8/19/2009	Settlement and License Agreement between ePLUS, Inc. and SciQuest, Inc. and Exhibits A and B		X	X					X			
DX-752	PX-0320	ePLUS0940815	ePLUS0940835	7/7/2009	Settlement and License Agreement between ePLUS Inc. and Verian Technologies, Inc. and Exhibits A and B		X	X					X			
DX-753				3/25/2011	Transcript of Evidentiary Hearing regarding Motion for Permanent Injunction	X	X	X	X							X
DX-754				5/18/2011	Decision of the Board of Patent Appeals and Interferences	X	X	X					X			
DX-755				3/23/2012	Decision of the Board of Patent Appeals and Interferences	X	X	X					X			
DX-756				6/20/1905	2013.02.20 Deposition of K. Ugone – Exhibit 3—"Ugone et al., Preparing the Financial Expert or Economist" article		X									
DX-757					2013.02.20 Deposition of K. Ugone – Exhibit 4—"Accounting for Damages in Intellectual Property Litigation"		X									
DX-758				9/4/2009	2013.02.20 Deposition of K. Ugone – Exhibit 5—"Order, Two Inc. v. Dish Network Corp et al., C.A. 2:04-cv-01 (DF)		X									X

Respectfully Submitted,

March 18, 2013

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March, 2013, I will electronically file the foregoing

***ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS***

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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